

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

<p>TIMOTHY KING, MARIAN ELLEN SHERIDAN, JOHN EARL HAGGARD, CHARLES JAMES RITCHARD, JAMES DAVID HOOPER and DAREN WADE RUBINGH,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>GRETCHEN WHITMER, in her official capacity as Governor of the State of Michigan, et al,</p> <p style="text-align: center;">Defendants,</p> <p style="text-align: center;">and</p> <p>CITY OF DETROIT, et al,</p> <p style="text-align: center;">Intervenor-Defendants.</p>	<p>No. 2:20-cv-13134</p> <p>Hon. Linda V. Parker</p>
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**INTERVENOR-DEFENDANT CITY OF DETROIT’S EX PARTE MOTION
TO EXTEND PAGE LIMIT**

Intervenor-Defendant City of Detroit (the “City”), by and through counsel, respectfully requests leave to file its Brief in Response to Plaintiffs’ Emergency Motion for Declaratory, Emergency, and Permanent Injunctive Relief in excess of the 25-page limit. In support of this request, the City states:

1. Plaintiffs filed an Emergency Motion for Declaratory, Emergency, and Permanent Injunctive Relief (ECF No. 7) on November 30, 2020. The Motion relies heavily upon Plaintiffs' First Amended Complaint, incorporating both the First Amended Complaint and its exhibits by reference. The First Amended Complaint and its exhibits are nearly 1,000 pages in length.

2. Pursuant to Local Rule 7.1(d)(3), a brief supporting a response to a motion may not exceed 25 pages. However, the Rule permits parties to apply *ex parte* to file a longer brief. Moreover, this Court has encouraged parties to request a page limit extension "[w]hen page limits are inadequate for a party's needs" *Elhady v Bradley*, 438 F. Supp. 3d 797, 821 n. 11 (E.D. Mich. 2020).

3. The City requests leave to file a response brief not to exceed 38 pages, in order to address the full scope of legal and factual issues raised by, and incorporated into, Plaintiffs' Motion.

4. The City has attempted to limit the length of the brief without sacrificing clarity and/or its ability to address the factual and legal issues supporting its response. However, due to the number of factual and legal issues needing to be addressed, the City has been unable to limit the brief to 25 pages.

WHEREFORE, the City respectfully requests that this Court permit it to file a response brief not to exceed 38 pages in response to Plaintiffs' Emergency Motion for Declaratory, Emergency, and Permanent Injunctive Relief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2020, I electronically filed the foregoing paper with the Clerk of the court using the electronic filing system, which sends notice to all counsel of record.

FINK BRESSACK

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